

EXHIBIT

A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TAMESHA MEANS,

Plaintiff,

vs.

Case No: 2:13-cv-14916-DPH-PJK

Hon. Denise Page Hood

UNITED STATES CONFERENCE OF
CATHOLIC BISHOPS, a not-for-profit
corporation, STANLEY URBAN, ROBERT
LADENBURGER, and MARY MOLLISON,

Defendants.

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NOTICE OF SPECIAL APPEARANCE

To: Clerk of the Court

Please enter the Special Appearance of attorney Mark J. Zausmer as counsel for the United States Conference of Catholic Bishops. This Special Appearance is entered for the limited purpose of challenging personal jurisdiction and concurring in co-Defendants' venue challenge, both of which must be addressed under Rule 12 at the outset. This Special Appearance is also entered for the limited purpose of ensuring that Plaintiff and the court are on notice that the United States Conference of Catholic Bishops is not voluntarily submitting to the district court's jurisdiction, and that no action in the course of challenging personal jurisdiction and/or concurring with co-Defendants' venue challenge should be construed as such. By entering this Special Appearance, the United States Conference of Catholic Bishops seeks to prevent the court from exerting any effort that would be considered wasted if personal jurisdiction is later found to be lacking. See, e.g.

Gerber v. Riordan, 649 F.3d 514, 519 (6th Cir. 2011) (citing *Mobile Anesthesiologists Chicago, LLC v. Anesthesia Associates of Houston Metroplex, P.A.*, 623 F.3d 440, 443 (7th Cir.2010)). This Special Appearance is also filed to ensure all defenses are preserved and that no defenses are waived in the event that the court exerts personal jurisdiction over the United States Conference of Catholic Bishops. By filing this Special Appearance, the United States Conference of Catholic Bishops seeks to avoid knowingly and volitionally relinquishing any existing right.

Respectfully submitted:

ZAUSMER, KAUFMAN, AUGUST
& CALDWELL, P.C.

/s/ Mark J. Zausmer
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Dated: February 3, 2014

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I caused the foregoing Notice of Special Appearance of Mark J. Zausmer for Defendant, United States Conference of Catholic Bishops and this Certificate of Service to be electronically filed with the Clerk of the Court using the Case Management/Electronic Case Filing (CM/ECF) system which will presumptively forward notification of this filing electronically to the following attorneys of record:

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Respectfully submitted:
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/s/ Mark J. Zausmer

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Please enter the Special Appearance of attorney Cameron R. Getto as counsel for the United States Conference of Catholic Bishops. This Special Appearance is entered for the limited purpose of challenging personal jurisdiction and concurring in co-Defendants' venue challenge, both of which must be addressed under Rule 12 at the outset. This Special Appearance is also entered for the limited purpose of ensuring that Plaintiff and the court are on notice that the United States Conference of Catholic Bishops is not voluntarily submitting to the district court's jurisdiction, and that no action in the course of challenging personal jurisdiction and/or concurring with co-Defendants' venue challenge should be construed as such. By entering this Special Appearance, the United States Conference of Catholic Bishops seeks to prevent the court from exerting any effort that would be considered wasted if personal jurisdiction is later found to be

lacking. See, e.g. *Gerber v. Riordan*, 649 F.3d 514, 519 (6th Cir. 2011) (citing *Mobile Anesthesiologists Chicago, LLC v. Anesthesia Associates of Houston Metroplex, P.A.*, 623 F.3d 440, 443 (7th Cir.2010)). This Special Appearance is also filed to ensure all defenses are preserved and that no defenses are waived in the event that the court exerts personal jurisdiction over the United States Conference of Catholic Bishops. By filing this Special Appearance, the United States Conference of Catholic Bishops seeks to avoid knowingly and volitionally relinquishing any existing right.

Respectfully submitted:

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